

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS DEFENDANT
C.R. BARD, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and Defendant C.R. Bard, Inc. (“Bard”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third-party claims. Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard as a defendant in these actions with prejudice, and terminate Bard from the docket in the actions, parties to bear their own costs.

Respectfully:

/s/ Richard B. North, Jr.
NELSON MULLINS RILEY & SCARBOROUGH LLP
Atlantic Station, 201 17th Street, NW
Suite 1700
Atlanta, GA 30363
(404) 322-6000
Attorney for Defendant C.R. Bard, Inc.

/s/ Caroline L. Maida
MOSTYN LAW FIRM
3810 West Alabama Street
Houston, TX 77027
(713) 714-0000
Attorney for Plaintiffs on Exhibit A

Dated: March 12, 2019

EXHIBIT A – MOSTYN LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-cv-22193	Wilma Hedge v. C.R. Bard, Inc., et al.
2:15-cv-09298	Gloria Sutton and R.V. Sutton v. C.R. Bard, Inc., et al.
2:15-cv-09523	Sharon Harper and Lonnie Harper v. C.R. Bard, Inc., et al.

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.